

J. H. EDWARDS COMPANY
A REAL PROPERTY CONCERN

November 14, 2013

San Luis Obispo County Planning and Building Department
County Government Center, Room 200
San Luis Obispo, CA 93408

RE: (FWS-R8-ES-2013-N167; FF08ESMF – FXES11120800000-134)
Habitat Conservation Plan for the Community of Los Osos, San Luis Obispo County,
California. Environmental Impact Report/Environmental Assessment

Attention: John McKenzie

Dear Mr. McKenzie

Please include these comments on the project listed above.

With regard to the Morro shoulderband snail (MSS), the Los Osos Waste Water Project (LOWWP) monitoring data should be included in the Habitat Conservation Plan (HCP). Recent surveys suggest that MSS presence reaches considerably further east of original surveys done on the Morro Bay sandspit. Personal observations include finding MSS as far east as Turri Road. Its distribution may extend throughout the Morro Bay watershed.

The MSS was downlisted in 2006 to "Threatened." With the new data indicating its abundance and broad distribution, it begs the question, as to whether or not it is indeed threatened or endangered. Perhaps the MSS should be delisted altogether.

The Morro kangaroo rat should be a covered species in the HCP. At a minimum, it should be a covered species within the Urban Services Line. The basis for this is the historical trapping both in the urban area as well as the rural areas.

The covered activities as presented include Capital Projects. The activities should expressly include those water resource development and distribution projects as identified in the Los Osos Basin Plan action programs.

(<http://www.slocountywater.org/site/Water%20Resources/Reports/pdf/Basin%20Plan%20Public%20Review%20Draft%208.1.2013.pdf>)

It should also include the potential for surface water discharge (NPDES permit) in Los Osos Creek as it relates to groundwater basin recharge and management by the Los Osos Community Services District and Golden State Water Company.

The HCP discusses invasive plant species and the management of them. One invasive that is not included in the HCP is devastating in its effects on the Coast Live oak

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woodland habitats and requires attention. The invasive is *Asparagus asparagoides*, commonly known as Bridal creeper, Bridal-veil creeper, Gnarboola, Smilax or Smilax asparagus Bridal creeper is a herbaceous climbing plant of the family Asparagaceae and is native to tropical and southern Africa. This plant is choking out the root systems of the pygmy oaks in and around the Elfin Forest as an example. Please see the attached photograph of Bridal creeper. Oak woodlands are a key component of the Los Osos Greenbelt. Please incorporate the 2005 Los Osos Greenbelt study prepared by the San Luis Obispo Land Conservancy into the HCP.

The growth inducement section including Housing and Population should reflect the limitations associated with water availability in Los Osos. It is uncertain if any of the suggested Programs in the Los Osos Basin Plan will be implemented. The first tier of Programs would allow for about 850 new dwelling units over a twenty year time horizon. This equates to an increase in population of just over 2,000 people. Additional Programs would require implementation to produce additional water resources to accommodate further development.

Finally, the term of the Section 10(a)(1)(B) permit should be 30 years which may be a better reflection of the time horizon needed for the buildout of the community.

Sincerely,

Jeff Edwards

Jeff Edwards